

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195 (SHS) (OTW)

Daily News, LP; Chicago Tribune Company,  
LLC; Orlando Sentinel Communications  
Company, LLC; Sun-Sentinel Company,  
LLC; San Jose Mercury News, LLC; DP  
Media Network, LLC; ORB Publishing,  
LLC; and Northwest Publications, LLC

Plaintiffs,

v.

MICROSOFT CORPORATION, et al.,

Defendants.

Civil Action No. 1:24-cv-3285 (SHS) (OTW)

**PLAINTIFFS THE NEW YORK TIMES COMPANY AND DAILY NEWS, LP ET AL.'S  
MOTION TO SEAL**

Under paragraph 22 of the Stipulated Protective Order in this case (Dkt. 127), Plaintiffs The New York Times Company (“The Times”) and Daily News, LP et al. (“Daily News”) (collectively, the “News Plaintiffs”) respectfully seek to provisionally file under seal a portion of their letter motion to compel. The letter motion seeks a conference to discuss a discovery dispute—specifically, the News Plaintiffs’ request for Microsoft to collect and produce documents from an additional custodian. The News Plaintiffs seek to file portions of this letter motion under seal because an exhibit to the motion discusses documents that Microsoft designated as Protected Discovery Material under the Protective Order. Dkt. 127 ¶ 22. The News Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Microsoft has five business days to file a statement of reasons for why the material should be sealed. *Id.* The News Plaintiffs will review Microsoft’s filing, and if necessary, confer about any disagreement.

Dated: October 22, 2024

/s/ Ian Crosby

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Northwest Publications, LLC***